

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

23 November 2018

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Thirty-sixth session

Geneva, 5-7 December 2018

Item 4 (b) of the provisional agenda

Hazard communication: Improvement of annexes 1 to 3 and further rationalization of precautionary statements

Proposed work plan for the informal working group on the improvement of Annexes 1-3 of the GHS

Transmitted by the expert from the United Kingdom on behalf of the working group

1. The informal working group on improving Annexes 1 to 3 of the GHS proposes the following plan of work for the biennium 2019-2020.
2. The overall goal remains the improvement of Annexes 1-3 and further rationalisation of precautionary statements. Within this there are three key areas of focus:
 - (a) To develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners. This may include proposals to rationalise and clarify ambiguous or unhelpful instructional precautionary statements, such as statements relating to disposal.
 - (b) To eliminate inconsistencies in the presentation of precautionary statements in Annex 3, including looking at disparities between the application of precautionary statements for different hazard classes/categories.
 - (c) To consider and address other issues within the working group's terms of reference as they arise.
3. The current list of tasks that the informal working group proposes to tackle in the next biennium is in the Annex to this paper. The Working Group has delivered on four items in its extensive workplan for 2017-2018 including: precautionary pictograms¹; hazard sub-categorisation²; amendments to headings used for A3.3.4 and A3.3.5³; and correction to the word 'desensitizing' in P212³. However, some specific items of work have been carried over to the next biennium. More tasks will be added in the course of the biennium as appropriate, including any issues the Sub-Committee may allocate to the working group to take forward.
4. The Sub-committee is invited to agree the proposed plan of work.

¹ ST/SG/AC.10/C.4/2018/5 and ST/SG/AC.10/C.4/70

² ST/SG/AC.10/C.4/2018/6 (as amended by informal document INF.31, 35th session) and ST/SG/AC.10/C.4/70

³ Informal document INF.11 (34th session) and ST/SG/AC.10/C.4/68

Annex

<i>No.</i>	<i>Topic</i>	<i>Issue</i>	<i>Proposed work</i>
1	<u>P501 – Waste disposal PS</u>	P501 tends to result in labels telling users to dispose of ‘contents/container to a waste disposal site in accordance with national regulation’. This places the burden on the user to find the appropriate disposal outlet and does not encourage recycling. The condition for use is also currently used as a continuation of the precautionary statement by manufacturers/suppliers and is inconsistent with other PS. P501 also appears on some workplace-only products where it is unnecessary.	<ul style="list-style-type: none"> • Look into the viability of instructing users to dispose of products at specific sites, including looking at varying disposal requirements for consumers and workers, via a change to the PS and/or condition for use. • Consider limiting application of P501 for the workplace when normal chemical waste disposal procedures suffice.
2	<u>Conditional use of P102 precautionary pictograms</u>	Section 5 of Annex 3 contains two example precautionary pictograms corresponding to P102 ‘Keep out of reach of children’ on consumer labels. Given there is often competing space on labels and that illiteracy and reading abilities levels can vary widely globally, it is important to find effective way to convey P102 message to consumers within the confines of labels and various jurisdictions labelling requirements.	<ul style="list-style-type: none"> • Consider how the example pictograms could be used on consumer labels (e.g. as an alternative to written precautionary statements) whilst ensuring that any such use would be consistent with the legal requirements of the different jurisdictions globally, and the potential implications and precedents from any such proposed use.
3	<u>Hand-eye contact</u>	At present the precautionary statements do not make a link between eye irritants and skin exposure, thereby overlooking the fact that hand-eye contact is a major source of eye contact with a substance/mixture.	<ul style="list-style-type: none"> • Consider adding “Eye irritation” to the P302, “IF ON SKIN”, triggers. • Consider creating new precautionary statement to highlight risk of hand-eye contact for eye irritants.
4	<u>Combination statements</u>	Combination statements are presented inconsistently in Annex 3. Some combination statements are shown in the tables while others are not. In the PS matrix the presentation of combination statements can be misleading, especially in routes of exposure + response whereby the route of exposure is presented as only applying to one response rather than multiple.	<ul style="list-style-type: none"> • Discuss the value of presenting combination statements in the PS tables and consider their removal. • Consider changing the presentation in the matrix to show that routes of exposure do not only apply to one response – possibly by avoiding putting multiple PS on the same line.
5	<u>Sensitisation - respiratory</u>	The PS for “Sensitisation – respiratory” does not include any reference to specific immediate treatment to alleviate symptoms, although these might be available.	<ul style="list-style-type: none"> • Consider applying an extra PS for “Sensitisation – respiration”, perhaps using P271, “Specific treatment (see ... on this label)”.

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6	<u>Pictograms and notes in Annex 1</u>	Annex I has evolved over time and the use of pictograms and notes may not be consistent	<ul style="list-style-type: none"> Review the GHS and TDG pictograms and the use of notes in Annex I to ensure consistent and helpful presentation across hazard classes and categories.
7	<u>Chemically unstable gases</u>	There are inconsistencies with the presentation of hazard categories chemically unstable gases.	<ul style="list-style-type: none"> Review the presentation of hazard categories for chemically unstable gases.